

Holly M. Simpkins (*pro hac vice*)
HSimpkins@perkinscoie.com
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101
Telephone: 206.359.8000
Facsimile: 206.359.9000

Andrew N. Klein, Bar No. 300221
AKlein@perkinscoie.com
PERKINS COIE LLP
3150 Porter Drive
Palo Alto, CA 95130
Telephone: 650.838.4300
Facsimile: 650.838.4350

Attorneys for Plaintiffs
EPIC GAMES, INC. and EPIC GAMES
INTERNATIONAL S.À.R.L.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

EPIC GAMES, INC., a Maryland
corporation; and EPIC GAMES
INTERNATIONAL S.À.R.L., a
Luxembourg Société à Responsabilité
Limitée,

Plaintiffs,

v.

JAMES MENDES, an individual;
KONSTANTIN VLADIMIROVICH RAK,
an individual; and OLEKSEY
OLEKSEEVICH STEGAILO, an
individual,

Defendants.

Case No. 3:17-cv-06223-LB

**DECLARATION OF HOLLY M. SIMPKINS
IN SUPPORT OF PLAINTIFFS EPIC
GAMES, INC. AND EPIC GAMES
INTERNATIONAL S.À.R.L.'S
ADMINISTRATIVE MOTION TO SUBMIT
MOTION FOR ENTRY OF DEFAULT AS
TO DEFENDANT KONSTANTIN
VLADIMIROVICH RAK WITHOUT
HEARING**

Judge: Hon. Laurel Beeler
Courtroom: C, 15th Floor

DECLARATION OF HOLLY M. SIMPKINS

I, Holly M. Simpkins, declare as follows:

1. I am an attorney licensed to practice law before the courts of the State of Washington. I am Senior Counsel at Perkins Coie LLP, and counsel in this action for Plaintiffs Epic Games, Inc. and Epic Games International S.à.r.l. (“Epic”). I submit this declaration in support of Epic’s Administrative Motion to Submit Motion for Entry of Default as to Defendant Konstantin Vladimirovich Rak Without Hearing. I have personal knowledge of the facts stated herein and, if called upon, I could and would testify competently thereto under oath.

2. Epic was unable to obtain a stipulation for this motion under Local Rule 7-12 from Defendant Konstantin Vladimirovich Rak because, despite the deadline to respond to the Complaint having lapsed, Rak has not appeared in this matter.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 10th day of May, 2018, at Los Angeles, California.

/s/ Holly M. Simpkins
Holly M. Simpkins